



Mike DeWine, Governor  
Jon Husted, Lt. Governor  
Laurie A. Stevenson, Director

August 16, 2019

**Certified Mail: 7018 1130 0000 4826 1208**

Tim Check, Supervisor-EHS  
Utica Gas Services, LLC  
8701 Port Jackson Ave. NW  
North Canton, OH 44720-7137

**Re: Williams - Scio Compressor Station  
Resolution of Violation (ROV)  
Air Permit  
Harrison County  
0634005056**

**Division of Air Pollution Control**

**Subject: Notice of Violation**

Dear Mr. Check:

Thank you for your June 11, 2019 response to Ohio EPA's April 26, 2019 Notice of Violation letter. I have reviewed the documentation and determined that Utica Gas Services, LLC has adequately resolved the violation discovered during the March 13, 2019 inspection. Utica Gas Services, LLC's response and status with respect to the violation is listed below.

**Resolution of Violation**

***Letter Citation: Finding 1***

1. ***Rule Citation: ORC chapter 3704.05(C): "No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."***

**PTI P0123023, Term C.2.d)(4) and Term C.3.d)(4) :** *"The permittee shall conduct periodic inspections of the flare to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request."*

- (a) The manufacturer recommends that certain tasks be performed for flares for EU P014 and EU P015. Specifically, the manufacturer recommends that the following inspections be performed semi-annually:
  - Remove pilot strainer and clear debris
  - Inspect pilot head for flame damage or excessive corrosion
- (b) Utica Gas Services, LLC personnel reported that these inspections were performed annually.

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(c) Utica Gas Services, LLC must submit a compliance plan outlining the company's strategy to attain compliance with the periodic inspections of EU P014 and EUP015 as required in PTI P0123023.

In the June 11, 2019 response you sent to Ohio EPA, you stated that UGS has worked with the flare manufacturer to create a maintenance plan tailored specifically for the flares at the Scio station.

Please submit the site-specific maintenance plan for the flares to Ohio EPA Southeast District Office by August 30, 2019.

Because Williams, Utica Gas Services has sought a site specific maintenance plan and will adhere to this plan after its development, Ohio EPA considers this violation resolved.

Please note that this does not preclude the Director from seeking administrative or civil penalties pursuant to Ohio Revised Code section 3704.06 for the violation(s) noted in the July 3, 2017 NOV letter. The decision on whether to pursue or decline to pursue such penalties regarding these violations is dependent on several factors, one of which is the company's future compliance with Ohio EPA regulatory requirements.

Should you have any questions, please contact me at (740) 380-5201 or by e-mail at [sandra.colegrove@epa.ohio.gov](mailto:sandra.colegrove@epa.ohio.gov).

Sincerely,



Sandy Colegrove  
Environmental Specialist II  
Division of Air Pollution Control  
Ohio EPA – Southeast District Office

SC/cs

ec: John Paulian/James Kavalec, DAPC/CO  
John Rochotte, DAPC/SEDO  
Brian Dickens, USEPA Region V